

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ASSOCIATED RECOVERY, LLC,

Plaintiff,

v.

LINDA BUTCHER *ET AL.*,

Defendants.

No. 2:16-cv-126-JRG-RSP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

This action involves many defendants with different deadlines to answer, move, or otherwise respond to Plaintiff's Amended Complaint. For example, the Movants to this Motion—the majority of appearing Defendants—currently have the following deadlines:

August 10: Quinn Veysey; Priveco, Inc.; Virtual Investments, LLC; Telepathy, Inc.; and Strong, Inc. (via first extensions);

August 11: Adam Strong and Creation Media, LLC (via first extensions);

August 12: Onig, LLC/Unicorn Ranch, LLC (via first extension);

August 15: True Magic, LLC (via first extension);

August 20: CBRE Group, Inc. (via first extension);

August 22: Power Home Technologies, LLC (via first extension) and State Farm Mutual Automobile Insurance Company (via second extension);

August 23: Tumult, Inc. and Radical Investments Management, LLC (via second extensions); and

August 25: Slice Technology, Inc. (via second extension).

The foregoing Defendants ("Movants") plan to file a consolidated motion to dismiss or, in the alternative, transfer Plaintiff's claims against them with respect to common issues.¹ A

¹ Some Defendants may raise individual issues, such as lack of personal jurisdiction, in supplemental briefs filed by at the same time as the consolidated motion. But the Movants will seek to incorporate as many common issues as practical into the consolidated briefing.

consolidated motion will reduce the burden on the Court when considering and ruling on the issues raised therein. Likewise, a consolidated motion will reduce the burden on Plaintiff when responding. Accordingly, Movants respectfully request that the Court extend their respective deadlines to September 1, 2016, by which time Movants will file their motion to dismiss or, in the alternative, transfer Plaintiff's claims against them. This Motion is not meant for delay. The Court has not yet set a schedule, and not all defendants have yet appeared. Plaintiff does not oppose this Motion.

Dated: August 9, 2016

Respectfully submitted

By: /s/ Steven M. Geiszler

Steven M. Geiszler
Texas Bar No. 24032227
DENTONS US LLP
2000 McKinney Avenue, Suite 1900
Dallas, Texas 75201-1858
T: (214) 259-0951
steven.geiszler@dentons.com
*Counsel for Creation Media, LLC; Onig,
LLC; Adam Strong; Strong, Inc.; True Magic,
LLC; and Virtual Investments, LLC*

By: /s/ Bobby Lamb (w/permission SMG)

Bobby Lamb
GILLAM & SMITH
303 S. Washington Avenue
Marshall, Texas 75670
T: (903) 934-8450
wrlamb@gillamsmithlaw.com
Counsel for Power Home Technologies, LLC

By: /s/ Matthew T. Furton (w/permission SMG)

Matthew T. Furton
LOCKE LORD LLP
111 S. Wacker Drive
Chicago, IL 60606
T: (312) 443-0445
mfurton@lockelord.com
Counsel for CBRE Group, Inc.

By: /s/ Brian H. Pandya (w/permission SMG)

Brian H. Pandya
WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
T: (202) 719-7457
bpandya@wileyrein.com
Counsel for Telepathy, Inc.

By: /s/ R. William Beard, Jr. (w/permission SMG)

R. William Beard, Jr.
SLAYDEN GRUBERT BEARD PLLC
401 Congress Avenue, Suite 1900
Austin, Texas 78701
T: (512) 402-3556
wbeard@sbgfirm.com
*Counsel for State Farm Mutual Automobile
Insurance Company*

By: /s/ Franklin M. Smith (w/permission SMG)

Franklin M. Smith
DICKINSON WRIGHT PLLC
2600 W. Big Beaver Rd., Suite 300
Troy, Michigan 48084
T: (248) 433-7393
fsmith@dickinsonwright.com
Counsel for Priveco, Inc.

By: /s/ Jennifer P. Ainsworth (w/permission SMG)

Jennifer P. Ainsworth
WILSON, ROBERTSON & CORNELIUS, P.C.
909 ESE Loop 323, Suite 400
Tyler, Texas 75701
(903) 509-5000 Main
(903) 509-5001 Direct
(903) 509-5092 Fax
jainsworth@wilsonlawfirm.com
Counsel for Tumult, Inc.

By: /s/ Darin M. Klemchuk (w/permission SMG)

Darin Michael Klemhuck
KLEMCHUK LLP
Campbell Centre II
8150 North Central Expressway, 10th Floor

Dallas, Texas 75206
T: (214) 367-6000
darin.klemchuk@klemchuk.com
*Counsel for Radical Investments Management,
LLC*

By: /s/ Mark Levine (w/permission SMG)
Mark Levine
WEYCER, KAPLAN, PULASKI & ZUBER P.C.
11 Greenway Plaza, Suite 1400
Houston, Texas 77046
T: (713) 961-9045
mlevine@wkpz.com
Counsel for Quinn Veysey

By: /s/ Joel Boehm (w/permission SMG)
Joel Christian Boehm
WILSON SONSINI GOODRICH & ROSATI
900 South Capital of Texas Hwy
Las Cimas IV, Fifth Floor
Austin, TX 78746-5546
T: (512) 338-5400
jboehm@wsgr.com
Counsel for Slice Technology, Inc.

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that on August 4, 5, 8, and 9 counsel for the Movant Defendants corresponded by email with Plaintiff's counsel regarding the foregoing Motion. Plaintiff does **not** oppose the Motion or requested extension.

/s/ Steven M. Geiszler
Steven M. Geiszler

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 9, 2016 I caused the foregoing document to be served on counsel of record via the Court's CM/ECF system.

/s/ Steven M. Geiszler
Steven M. Geiszler